

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

ANTHONY ANDERSON,)
)
)
PLAINTIFF,)
)
)
v.) CASE NO. 1:08-CV-175-MHT
)
)
OFFICER JACKSON and the)
CITY OF DOTHAN,)
)
)
DEFENDANTS.)

REPORT OF PARTIES' PLANNING MEETING

Come now the parties pursuant Rule 26(f) and would report and submit the following regarding their planning meeting.

- 1) Pursuant to Federal Rules of Civil Procedure 26(f), a meeting was held on July 18, 2008, by telephone and was attended by:

Lee D. Winston, Esquire
Roderick T. Cooks, Esquire
Attorney for Plaintiff, Anthony Anderson

F. Lenton White, Esquire
Attorney for Defendant, City of
Dothan, Alabama
- 2) Pre-Discovery Disclosures. The parties will exchange the information required by Federal Rules of Civil Procedure 26(a)(1) within 14 days of the meeting.

3) Discovery Plan. The parties jointly propose to the court the following discovery plan:

Discovery on all claims and defenses.

All discovery commenced in time to be completed by February 26, 2009.

Maximum of 30 interrogatories by each party to any other party. Responses due 30 days after service.

Maximum 30 request for production, including discrete subparts. Responses due 30 days after service.

Maximum of 15 requests for admission by each party to any other party. Responses due 30 days after service.

Maximum of fifteen depositions by plaintiff(s) and fifteen by defendant(s).

Each deposition (other than of Plaintiff and Defendant) limited to maximum of seven (7) hours unless extended by agreement of the parties.

Reports from retained experts under Rule 26(a)(2) due:

from Plaintiff(s) by October 27, 2008.

from Defendant(s) by December 29, 2008.

Supplementations under Rule 26(e) due within 30 days of identification.

4) Other Items.

The Plaintiff will execute a HIPPA Authorization form by August 15, 2008.

The parties do not request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in April, 2009.

The parties should be allowed until September 26, 2008, to join additional parties and September 26, 2008, to amend pleadings.

All potentially dispositive motions should be filed no later than 90 days prior to the pretrial hearing.

Settlement cannot be evaluated prior to twenty-one days after the deadline for the filing of dispositive motions.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

from Plaintiff by April 16, 2009.

from Defendants by April 16, 2009.

Parties should have fourteen days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by May 26, 2009, and at this time is expected to take approximately 2-3 days.

Respectfully submitted this the 18th day of July, 2008.

s/ Roderick T. Cooks

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OF COUNSEL FOR PLAINTIFF

s/ Lee D. Winston
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OF COUNSEL FOR PLAINTIFF

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CITY OF DOTHAN, ALABAMA